

Western Cooperative

for educational telecommunications

PO Drawer P Boulder CO 80301-9752 303-541-0231 fax 303-541-0291

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March 18, 1994

Mr. William F. Caton
Acting Secretary
Office of the Secretary
C. C. Docket # 92-297
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Caton:

The Western Cooperative for Educational Telecommunications believes that any negotiated rulemaking committee to develop LMDS rules should include a fair number of educational representatives. Therefore, we would like the Federal Communications Commission to consider Ms. Willi Bokenkamp, Senior Communications Analyst for the University of California System, to serve on the Advisory Committee to negotiate proposed rules for the shared utilization of the 28Ghz band for LMDS and satellite communications services.

The Western Cooperative is a membership organization whose constituents represent higher education institutions, K-12 educational agencies and service districts, state government, public broadcasting, and private sector telecommunications services providers. Our 150 members come principally from 15 western states and represent some of the country's leading providers of telecommunications-delivered instruction. In addition, the Western Cooperative is a program of the Western Interstate Commission for Higher Education (WICHE), an interstate educational compact approved by the U.S. Congress in 1953, and as a result has direct links to key education and state government leaders in the region.

The Western Cooperative and the institutions that join us in this nomination would like the FCC to understand that strong participation from educational groups in such negotiations is critically important to our ability to plan, build, and operate a variety of technological delivery systems that will allow us to offer tomorrow's students access to a wide variety of educational programs and to do so in a way that is flexible and independent of time and place restrictions. The demonstration programs that the U.S. Department of Commerce will fund under the new Telecommunications Information Infrastructure Assistance Program (TIIAP) certainly stresses the need for this country's public service sectors to employ new technologies to reach underserved citizens. While these institutions and their counterparts in the West are under extremely

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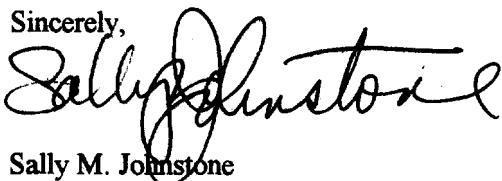
tight budget constraints at the present time, it is imperative that these potential users of LMDS and other future technologies be included from the start in the federal government's rulemaking process.

Ms. Willi Bokenkamp is well qualified to contribute to the committee's work. She would bring to the committee a wealth of experience as a facilitator and technical adviser on educational and industry partnerships involving radio, public television, wireless cable, and ITFS. She not only represents the nine university campuses of the University of California System on FCC licensing and other telecommunications issues, she plays a leadership role in the Alliance for Distance Education in California (ADEC), a consortia of California's K-12 and postsecondary institutions. The Western Cooperative and its members from K-12, community college, private and public postsecondary institutions heartily stand behind her abilities to address current and future issues facing educational institutions as they develop their capacities for using educational telecommunications.

We are disappointed with the exclusionary effect of the proposed meeting format that will require members of the committee to participate in face-to-face meetings in the Washington, D.C. area. If selected to serve on the advisory board, Ms. Bokenkamp, supported by the Office of the President of the University of California, could travel to D.C. for a number of the meetings. We would hope, however, that the Commission would accommodate members of the Advisory Committee who are not located in the Beltway area and enable them to participate in some of the meetings via audioconferencing and/or videoconferencing. Moreover, if the Commission would consider a schedule that rotated the meeting site between Washington, D.C. and Texas or southern California (where some of the identified industry and educational groups are located), the University of California has agreed to offer facilities where the Advisory Committee could convene.

If Ms. Bokenkamp is selected to serve on this committee, she will be representing an impressive number of educational institutions that are attempting to plan for and use the rich array of technological resources that are becoming available. Thank you for your serious consideration of our comments.

Sincerely,



Sally M. Johnstone

Director

Western Cooperative for Educational Telecommunications

on behalf and with the approval of:

Robert Threlkeld
California State Polytechnic
University, Pomona

Edward Groenhout
Northern Arizona University

Spencer Freund
California State University, Sacramento

Amy Philipson
University of Washington

Jack Parris
University of Arizona

David Lassner
University of Hawaii System